

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

v.

**RYAN FARACE and
JOSEPH FARACE**

Defendants.

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CRIMINAL NO. CCB-21-294

CONSENT MOTION TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

Comes now the United States of America, by and through its counsel, Erek L. Barron, the United States Attorney for the District of Maryland, and Dana J. Brusca, Assistant United States Attorney for said district, and with the consent of counsel for the Defendant, respectfully submits this Consent Motion to Exclude Time Under the Speedy Trial Act.

1. On August 3, 2021, a one-count indictment was returned against the Defendants, Ryan and Joseph Farace, for Conspiracy to Commit Money Laundering, in violation of 18 U.S.C. § 1956(h). ECF No. 1.

2. On October 8 (Ryan) and October 6 (Joseph), 2021, the Defendants had their initial appearances and Ryan Farace further entered a plea of not guilty. ECF Nos. 11, 17, 18.

3. The Speedy Trial Act provides that the trial of the defendant shall commence within seventy days “from the filing date (and making public) of the information or indictment.” 18 U.S.C. § 3161(c)(1). However, pursuant to 18 U.S.C. § 3161(h)(7)(A), any delay resulting from a continuance is excluded for speedy trial purposes if based on a finding that the ends of justice

served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. The circumstances of this case require a continuance under the Speedy Trial Act. Here, discovery is somewhat voluminous and has required provision of hardware from the defense to the government. Further, as a result of the COVID-19 pandemic, it is especially difficult for defense counsel to review discovery with their clients—particularly defendants who are incarcerated pending trial. Finally, the schedules of counsel in this and other matters has necessitated additional time for defendants and counsel to review discovery, and in which the parties can determine if resolution of this matter can be reached short of a trial.

5. Defendants' counsel, David Walsh Little and Gerald Ruter, consent to the Speedy Trial Act exclusion requested by this motion.

WHEREFORE, with the consent of counsel for the Defendants, counsel for the Government requests that the Court exclude all time, pursuant to 18 U.S.C. § 3161(h)(7)(A), from February 4, 2022 through April 4, 2022 under the Speedy Trial Act.

Respectfully submitted,

Erek L. Barron
United States Attorney
District of Maryland

By: /s/
 Dana J. Brusca
 Assistant United States Attorney
 United States Attorney's Office
 District of Maryland